

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

**LENA CHRISTINE JENKINS-SMITH,

Debtor.**

CASE NO.: 20-62899

CHAPTER 7

**MOTION OF OLD TOWNE ENTERPRISES, LLC TO EXTEND TIME FOR FILING
COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT PURSUANT TO 11
U.S.C. § 523 AND/OR COMPLAINT OBJECTING TO DISCHARGE PURSUANT TO 11
U.S.C. § 727**

COMES NOW Old Towne Enterprises, LLC (“Movant”) and shows the Court as follows:

1.

Movant is a creditor of Debtor and holds a judgment against Debtor.

2.

Movant is currently investigating matters which may affect the administration of the Debtor’s estate and the Debtor’s right to a discharge. The investigation is ongoing and requires further inquiry.

3.

It may be appropriate for Movant to bring an action to declare the indebtedness owing to Movant nondischargeable if it is determined, inter alia, that Debtor committed actual fraud or false pretenses in connection with the underlying debt that gives rise to said judgment. It may be warranted to bring a complaint objecting to Debtor’s discharge in this case.

4.

In order to have the necessary facts with which to formulate an appropriate Complaint to Determine Dischargeability and/or Objecting to Debtor's Discharge, it is necessary for Movant to continue its investigation into the actions of Debtor as they relate to Movant and this case.

5.

This request is made within the time set to file such complaints.

6.

Debtor consents to the extension of time requested.

WHEREFORE, Movant moves this Court to extend the time within which it may file a Complaint Objecting to Discharge of Indebtedness owing to it and the time within which it may file a Complaint Objecting to the Debtor's Discharge through and including August 31, 2020.

This 13th day of May, 2020.

Respectfully submitted,

ROUNTREE LEITMAN & KLEIN, LLC

/s/ Hal J. Leitman

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the following parties with a copy of the foregoing via first class mail, postage prepaid, an/or by the court using the CM/ECF system, which will send an electronic e-mail notification to the parties as indicated below:

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362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303

Dated: May 13, 2020.

/s/ Hal J. Leitman
Hal J. Leitman, Bar Number 446246